



Received & Inspected

AUG 03 2011

FCC Mail Room

Michael J. Shortley, III
Vice President & Regional
General Counsel - North America
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Rochester, NY 14623

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877.769.9844 (fax)
michael.shortley@globalcrossing.com

August 2, 2011

BY OVERNIGHT COURIER

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, Suite TW-A325
Washington, D.C. 20554

Re: EB Docket No. 06-36
Annual CPNI Certification
Global Crossing Telecommunications, Inc. and United States Affiliated
Telecommunications Carrier Entities
Filer ID Nos. 803667, 809586, 805772, 811776

Dear Ms. Dortch:

Global Crossing is herewith filing an original plus four (4) copies of this letter together with an original plus four (4) copies of a REVISED certification of compliance with the Commission's CPNI regulations.

Global Crossing is filing a revised certification to correct typographical errors contained in the CPNI compliance certificate filed under cover of letter dated February 23, 2011. The certification, as filed, contains a date of February 23, **2010**. Similarly, the dates under the execution lines on both the certificate and accompanying contain dates of February 21, **2010**. These dates are plainly typographical errors as footnote 1 to the certificate refers to certain activity that became effective December 10, 2010. As such, the actual dates could not have been February 23 and 21, **2010**, but must have been (and were) February 23 and 21, **2011**. A copy of the original certificate is annexed hereto as Exhibit A.

No. of Copies rec'd 0+4
UNCLASSIFIED

Moreover, the certificate was filed under cover of a transmittal letter dated February 23, 2011. A copy of the transmittal letter is annexed hereto as Exhibit B.

Finally, the documents were delivered by Federal Express on February 23, 2011 and arrived on February 24, 2011. A copy of the Federal Express label and tracking update is annexed hereto as Exhibit C.

To acknowledge receipt, please affix an appropriate notation to the copy of this letter provided herewith for that purpose and return same to the undersigned in the enclosed self-addressed envelope.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Michael J. Shortley, III". The signature is written in a cursive, flowing style with a large, stylized initial "M".

Michael J. Shortley, III

EXHIBIT A

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FCC Mail Room

CPNI COMPLIANCE CERTIFICATION

Global Crossing Telecommunications, Inc. and United States Affiliated Telecommunications Carrier Entities

1. Date filed: February 23, 2010
2. Name of company(s) covered by this certification: Global Crossing Telecommunications, Inc. and U.S. affiliated telecommunications carrier entities¹ (collectively, "Global Crossing").

3. Form 499 Filer ID: 803667; 809586; 805772; 811776

4. Name of signatory: Paul Kouroupas

5. Title of signatory: Vice President, Regulatory Affairs and Security Officer

6. Certification:

I, Paul Kouroupas, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules.
See 47 C.F.R. §64.2001 et. seq.

¹ The following are United States telecommunications carrier affiliates of Global Crossing: Global Crossing Telecommunications, Inc., Global Crossing Bandwidth, Inc., Global Crossing Local Services, Inc., Global Crossing Americas Solutions, Inc. f/k/a Impsat -USA, Inc. and Global Crossing Telemanagement Virginia, LLC. Effective December 31, 2008, Equal Access Networks, LLC (823088) merged into Global Crossing Ventures, Inc.; Global Crossing Ventures, Inc. merged into Global Crossing Telecommunications, Inc. and Global Crossing Holdings USA, LLC (822410) was dissolved. Effective December 31, 2010, the following Global Crossing North American entities were eliminated: Budget Call Long Distance, Inc. (808107) merged into Global Crossing North American Networks, Inc.; Global Crossing North American Networks, Inc. (808347) merged into Global Crossing Telecommunications, Inc. and Global Crossing Telemanagement, Inc. (805938) merged into Global Crossing Local Services, Inc. Global Crossing Telemanagement VA, LLC's sole member is now Global Crossing Local Services, Inc. To the extent that any of the entities were active in 2010, this certification applies to all such Global Crossing affiliates.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et.seq.* of the Commission's rules.

The company has not taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed  _____
Paul Kouroupas

Attachments: Accompanying Statement explaining CPNI procedures

Dated: February 21, 2010

Accompanying Statement of Global Crossing Telecommunications, Inc. and its U.S.

Affiliated Telecommunications Carrier Entities

Section 64.2005 (Use of CPNI without customer approval)

1. Global Crossing does not offer commercial mobile radio services. Global Crossing does offer local and interexchange services. Where a customer subscribes to both categories of service (local and interexchange), Global Crossing is permitted to use that customer's CPNI to market additional services in those categories to such customer. Where a customer subscribes to only one category of service (typically, interexchange because Global Crossing does not offer local service as a stand-alone service offering although it does have an extremely limited number of local-only customers), Global Crossing does not utilize a customer's CPNI in one category to sell services in the other category absent customer consent.

2. Global Crossing does not utilize CPNI to identify or track calls made to competing service providers.

Section 2007 (Approval required for use of CPNI)

3. Global Crossing did not, during the current period, use or rely upon oral customer approval for the use of CPNI for which such approval is required.

4. Global Crossing does not have any joint venture partners.

5. Global Crossing utilizes sales agents to a limited extent. The agency agreements require that the agents utilize CPNI only for lawful purposes, disallow the contractor from using, allowing access to or disclosing CPNI to any other party and to ensure the confidentiality of such information.

Section 2008 (Notice required for use of CPNI)

6. During the current period, Global Crossing did not solicit customer approval for use of CPNI on an opt-out basis.

7. During the current period, Global Crossing did not utilize an opt-in method of obtaining approval for the use of CPNI for which customer authorization is permitted, because it did not utilize CPNI for purposes not permitted absent customer consent,

8. Global Crossing did not, during the current period, utilize oral notification to obtain any limited, one-time use of CPNI.

Section 64.2009 (Safeguard required for use of CPNI)

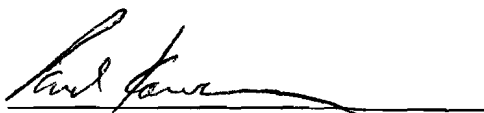
9. Global Crossing, through its ethics policy and training, trains its personnel as to when they may or may not use CPNI. All employees are required to take the ethics training and to certify that they understand and will comply with Global Crossing's ethics policy. Violations of the ethics policy are subject to disciplinary measures up to and including termination of employment.

10. During the current period, Global Crossing did not conduct any sales or marketing campaigns that utilized customers' CPNI.

Network Security Agreement

11. Global Crossing is a party to a Network Security Agreement with the Department of Homeland Security, the U.S. Department of Justice, the Federal Bureau of Investigation, and the U.S. Department of Defense. The Agreement was approved by this Commission on October 8, 2003 pursuant to an *Order and Authorization* for transfer of control (DA-03-3121). The Agreement requires Global Crossing to institute measures to, *inter alia*, "ensure that U.S. communications and related information are secure in order to protect the privacy of U.S.

persons and to enforce the laws of the United States.” The Agreement also requires Global Crossing to comply with the Commission’s CPNI rules. Through its implementation of the Agreement, Global Crossing has implemented various safeguards and measures, including enhanced background screening of personnel with access to CPNI as well as changes to our customer service processes and procedures, to ensure the integrity of CPNI and protect against “pretexting”.


Paul Kouroupas

Dated: February 21, 2010

EXHIBIT B



Global Crossing

Global Crossing North America, Inc.
225 Kenneth Drive
Rochester, New York 14623

Diane L. Peters
Director, Regulatory Affairs NA

585.255.1425
877.766.2492 Fax
diane.peters@globalcrossing.com

February 23, 2011

By Overnight Delivery

Marlene H. Dortch
Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, D.C. 20554

RE: EB Docket No. 06-36
Annual CPNI Certification
Global Crossing Telecommunications, Inc. and United States Affiliated
Telecommunications Carrier Entities
Filer ID Nos. 803667; 809586; 805772; 811776

Dear Ms. Dortch:

Enclosed for filing please find an original and four (4) copies of Global Crossing's certification of compliance with the Commission's CPNI regulations.

Sincerely,

Diane L. Peters

cc: Best Copy and Printing, Inc. (1) (by email)

EXHIBIT C

Peters, Diane

From: Blakely, Lori
Sent: Thursday, February 24, 2011 10:44 AM
To: Peters, Diane
Subject: FW: FedEx Shipment 796793915775 Delivered FCC CPNI

Diane

Please find below the confirmation that the FCC CPNI documents were delivered.

Thanks

Lori

From: TrackingUpdates@fedex.com [<mailto:TrackingUpdates@fedex.com>]
Sent: Thursday, February 24, 2011 10:05 AM
To: Blakely, Lori
Subject: FedEx Shipment 796793915775 Delivered

This tracking update has been requested by:

Name: Diane Peters
E-mail: lori.blakely@globalcrossing.com

Our records indicate that the following shipment has been delivered:

Reference: FCC CPNI - GC Entities
Ship (P/U) date: Feb 23, 2011
Delivery date: Feb 24, 2011 10:01 AM
Sign for by: R.EEDMONDS
Delivery location: CROFTON, MD
Delivered to: Receptionist/Front Desk
Service type: FedEx Standard Overnight
Packaging type: FedEx Envelope
Number of pieces: 1
Weight: 0.50 lb.
Special handling/Services: Deliver Weekday
Tracking number: 796793915775

	Recipient Information
Shipper Information	Secretary Marlene H. Dortch
Diane Peters	Federal Communications Commission
225 Kenneth Drive	9300 E HAMPTON DR
Rochester	OFFICE OF THE SECRETARY
NY	CAPITOL HEIGHTS
US	MD
14623	US
	20743

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All weights are estimated.

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Thank you for your business.

REVISED CPNI COMPLIANCE CERTIFICATION

Global Crossing Telecommunications, Inc. and United States Affiliated Telecommunications Carrier Entities

1. Date filed: August 2, 2011
2. Name of company(s) covered by this certification: Global Crossing Telecommunications, Inc. and U.S. affiliated telecommunications carrier entities¹ (collectively, “Global Crossing”).
3. Form 499 Filer ID: 803667; 809586; 805772; 811776
4. Name of signatory: Michael J. Shortley, III
5. Title of signatory: Vice President and Regional General Counsel – North America
6. Certification:

I, Michael J. Shortley, III, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission’s CPNI rules. *See* 47 C.F.R. §64.2001 *et. seq.*


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3. Global Crossing did not, during the current period, use or rely upon oral customer approval for the use of CPNI for which such approval is required.

4. Global Crossing does not have any joint venture partners.

5. Global Crossing utilizes sales agents to a limited extent. The agency agreements require that the agents utilize CPNI only for lawful purposes, disallow the contractor from using, allowing access to or disclosing CPNI to any other party and to ensure the confidentiality of such information.

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6. During the current period, Global Crossing did not solicit customer approval for use of CPNI on an opt-out basis.

7. During the current period, Global Crossing did not utilize an opt-in method of obtaining approval for the use of CPNI for which customer authorization is permitted, because it did not utilize CPNI for purposes not permitted absent customer consent,

8. Global Crossing did not, during the current period, utilize oral notification to obtain any limited, one-time use of CPNI.

Section 64.2009 (Safeguard required for use of CPNI)

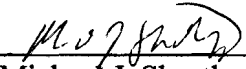
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Michael J. Shortley, III

Dated: August 2, 2011